

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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ABDULRAHMAN ALHARBI,

Plaintiff,

– v. –

GLENN BECK; THE BLAZE, INC.;  
MERCURY RADIO ARTS, INC.; AND  
PREMIERE RADIO NETWORKS, INC.

Defendants.

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CIVIL ACTION NO.  
1:14-cv-11550-PBS

**DEFENDANTS’ MOTION TO DISMISS THE COMPLAINT  
PURSUANT TO FED. R. CIV. P. 12(b)(6)**

Pursuant to Fed. R. Civ. P. 12(b)(6), Defendants Glenn Beck, TheBlaze Inc. (erroneously sued herein as “The Blaze, Inc.”), Mercury Radio Arts, Inc., and Premiere Radio Networks, Inc. (“Defendants”) move to dismiss the Complaint of Plaintiff Abdulrahman Alharbi in its entirety and with prejudice on the grounds that the Complaint fails to state a claim against Defendants. In support of their request, Defendants respectfully refer the Court to their Memorandum of Law, filed and served contemporaneously herewith.

**WHEREFORE,** Defendants respectfully request that the Court grant its Motion to Dismiss the Complaint in its entirety and with prejudice.

Dated: May 27, 2014

Respectfully submitted,

GLENN BECK, THEBLAZE INC.,  
MERCURY RADIO ARTS, INC., and  
PREMIERE RADIO NETWORKS, INC.,

By their attorneys,

GREENBERG TRAURIG, LLP

/s/ Mark A. Berthiaume

Michael J. Grygiel (Application for  
admission *pro hac vice* pending)  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants identified on the Notice of Electronic Filing on May 27, 2014.

/s/ Mark A. Berthiaume

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